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Name:

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CIVIL CASE # 13-CV-1766-HZ

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON **PORTLAND DIVISION**

Complaint on Discrimination in Education & Employment Discrimination (Violations of Title VI, Title IV and Title VII of the Civil Rights Act of 1964) in a Public Institute of Higher Education receiving Federal funds (Oregon Health & Science University School of Medicine)

Plaintiff:

KUMAR NAHARAJA

Vs.

Defendants: Carter Wray, Erika Finanger, Donald Girard, Joseph Pinter, Cindy Ferrell, Daniel Gibbs, Patrick Brunett, Sue Simmons, Jeff Kraakevik, Jason Coryell, Dana Braner, Thomas K Koch,

Stephen Back, and Barry Russman.

Motion for Injunctive relief

Honorable Chief District Judge Ann Aiken,

I am submitting a motion requesting the Court to provide injunctive relief and prevent Oregon Health and Science University School of Medicine from unlawful termination of my education and employment in the Child neurology residency training program in retaliation for engaging in federally protected activities, namely making a complaint to the internal Affirmative Action division of OHSU in November 2012 and submitting a complaint to the federal Equal Employment Opportunity Commission on February 4, 2013.

Sincerely,

Kumar Naharaja

Dated: 08/01/2013